

EXHIBIT G

ORIGINAL

1

1

LLEWELYN ANGELO WILLIAMS

2

UNITED STATES DISTRICT COURT

3

SOUTHERN DISTRICT OF NEW YORK

4

-----x
LLEWELLYN ANGELO WILLIAMS,

5

Plaintiff,

6

13-CV-3315 (NSR) (JCM) .
ECF-CASE

7

-against-

8

THE CITY OF NEW ROCHELLE,

9

THE CITY OF NEW ROCHELLE POLICE DEPARTMENT,

10

SERGEANT DANIEL CONCA,

11

SERGEANT JOHN INJEO,

SERGEANT WILSON,

POLICE OFFICER ADAM CASTIGLIA, POLICE OFFICER

EDWARD SILLER,

12

Defendants

13

-----X

14

515 North Avenue
New Rochelle, New York

15

July 5, 2016
1:15 p.m.

16

17

18

19

CONTINEUD DEPOSITION OF LLEWELYN ANGELO

20

WILLIAMS, Plaintiff, in the above-captioned

21

matter, held at the above time and place, before

22

a Notary Public of the State of New York.

23

DOUGLASS REPORTING COMPANY
445 Hamilton Avenue, Suite 1102
White Plains, New York 10601
(914) 426-2400

24

25

1 LLEWELYN ANGELO WILLIAMS

2 IT IS HEREBY STIPULATED AND AGREED, by
3 and between the attorneys for the respective
4 parties hereto, that this
5 examination may be sworn to before any
6 Notary Public.
7

8 IT IS FURTHER STIPULATED AND AGREED that
9 the sealing and filing of the said examination
10 shall be waived.
11

12 IT IS FURTHER STIPULATED AND AGREED
13 that all objections to questions except as to
14 form shall be reserved for trial.
15
16
17
18
19
20
21
22

23 DOUGLASS REPORTING COMPANY
24 445 Hamilton Avenue, Suite 1102
25 White Plains, New York 10601
(914) 426-2400

1 LLEWELYN ANGELO WILLIAMS

2 A P P E A R A N C E S:

3
4 RUSSELL B. SMITH, ESQ.
Attorneys for the Plaintiff
5 399 Knollwood Road, Suite 220
White Plains, New York 10603
6

7 NEW ROCHELLE LAW DEPARTMENT
8 Attorneys for the Defendants
515 North Avenue, 1st Floor
9 New Rochelle, NY 10801

10 BY: BRIAN POWERS, ESQ.

11
12
13 oOo
14
15
16
17
18
19
20
21
22
23
24
25

1 LLEWELYN ANGELO WILLIAMS

2 LLEWELYN ANGELO WILLIAMS,

3 having been duly sworn by Lisa Gerardi,
4 a Notary Public of the State of New York,
5 was examined and testified as follows:

6 oOo

7 EXAMINATION BY MR. POWERS:

8 Q. State your name and address for
9 the record.

10 A. Lllelewyn Angelo Williams, 22
11 Clinton Avenue, New Rochelle, New York, 10801.

12 Q. Good afternoon, Mr. Williams. As
13 you know, my name is Brian Powers. I'm one of
14 the attorneys for the City of New Rochelle.
15 I'm here to ask you some questions today with
16 respect to the supplemental sixth amended
17 complaint that's been filed on your behalf in
18 this matter. I know we did a prior deposition
19 back in January of 2015. You need me to
20 repeat those instructions from that first
21 deposition, or do you want me to go over them
22 again?

23 A. No.

24 Q. If at any time, you don't hear
25 the question or understand the question, let

1 LLEWELYN ANGELO WILLIAMS

2 A. Well, if that's the case, that's
3 what it says. But it don't say that -- my
4 sign is illegally if I got "Cash Only" on
5 there. It don't say that in the law. Does
6 it?

7 Q. No. The law says you have to
8 accept cash or credit cards.

9 A. It doesn't say I have to have a
10 sign that don't say "Cash Only." Does it say
11 that in the law? I don't read it in the law.

12 Q. Is that the sign that you
13 identified last time from CVS?

14 A. I have a sign closer to the
15 entrance that has \$45 on there. \$45 on that
16 sign.

17 Q. So is this incorrect sign still
18 up?

19 A. I don't know if it's still up or
20 not. I know I put another one up.

21 Q. Wasn't that the location you just
22 recently claimed that the guy from across the
23 street in Meineke were ripping your signs off
24 the wall?

25 A. Yep. And I put another sign up

1 LLEWELYN ANGELO WILLIAMS

2 on -- that sign they didn't -- they didn't rip
3 off a sign -- the one that got \$45. That was
4 on that wall. They ripped off the sign on the
5 fence, which would be the exit, and I put
6 another sign up again. I put another sign
7 over there, and that has \$45 on there.

8 Q. But didn't you also tell the
9 police that they ripped off the one by the
10 entrance, too?

11 A. They had another -- I have plenty
12 of signs. They was ripping them off --
13 they -- they sat there, and that's what they
14 do. So they ripped the signs off, as far as
15 I'm saying, and then they park their cars
16 there, and that -- they wait. Now when the
17 police, "The sign's not there. The sign's not
18 there. "

19 Well, I got picture of the signs
20 now, so if the signs go down again, and they
21 want to write me another city code, I got
22 pictures of the signs being up.

23 Q. How often do you check the signs
24 being in that lot?

25 A. Huh?

1 LLEWELYN ANGELO WILLIAMS

2 I said, "I'm on the line."

3 And then I got the recording that
4 you can hear me saying that. Then she said
5 she wasn't going to write the city code.

6 Conca came, and Conca ordered
7 here to write the city code even though I was
8 on line waiting to call in the boots. I had
9 already called. I was on the line, on hold,
10 waiting to call in the boots. And I had
11 already called and they -- there was aware
12 that three boots -- whatever the boots was --
13 that I was calling.

14 They said, "No problem. We'll
15 take the information."

16 Q. With respect to the allegations
17 made in paragraph 25, the new allegations in
18 that paragraph 66 of the amended complaint,
19 what officers were involved in the incident at
20 491 Main Street on May 17th of 2015?

21 MR. SMITH: Can he read the
22 paragraph maybe to refresh his
23 recollection?

24 A. I don't know.

25 MR. SMITH: He's going to read